

GS.I The general supervision instruments and procedures (including monitoring, complaint and hearing resolution, etc.), used by the LA, identify and correct IDEA noncompliance in a timely manner.

From OSEP letter on Self-Assessment, dated 03/2003:

OSEP cannot determine from the Self-Assessment:

- (1) the extent to which DESE has monitored, for compliance with Part C requirements, all of the agencies, institutions, and organizations used by the State to carry out Part C, including the extent to which DESE has monitored each of the SPOEs;
- (2) the effectiveness of DESE's monitoring procedures in identifying noncompliance; and
- (3) the effectiveness of DESE's procedures in ensuring the timely and effective correction of noncompliance.

1. Baseline/Trend Data and Analysis: (for reporting period July 1, 2002 through June 30, 2003)

Monitoring System Components

A system for monitoring of compliance with state and federal regulations implementing Part C of the Individuals with Disabilities Education Act (IDEA) has been developed to incorporate elements of the new Part C system redesign.

Elements of the monitoring system are:

- Review of data from Central Finance Office (CFO) reports
- On-site reviews at the SPOE to include:
 - Individual child record reviews
 - Staff interviews
 - Review of compliance with contractual obligations
- Review of surveys
 - Families
 - Providers
- Review of other public inputs
 - Phone calls
 - Mail (including e-mail)
 - Child complaints and due process hearing results

With the implementation of the CFO and the data system that it provides, a number of compliance requirements are monitored on a continuous basis through review of CFO reports. When review of these reports indicates potential compliance concerns, an immediate contact is made with the SPOE to investigate the issue.

Regular on-site reviews will also be scheduled with each SPOE. Prior to an on-site review, data reports will be analyzed, as well as review of information from surveys and other public inputs.

The monitoring system will address Early Intervention compliance standards and indicators developed around the Office of Special Education Programs (OSEP) cluster areas and indicators as well as the State Performance Goals and Indicators. To date, no monitoring of ongoing service coordinators or providers has occurred. This will change as the new RFP is put in place for Phase 1 SPOEs effective July 1, 2004. SPOEs will be responsible for overseeing all service coordination responsibilities. In addition, SPOEs will monitor progress notes being entered into the system by service providers.

A Peer Review Process will provide additional oversight for the system. Currently, the monitoring of service providers is scheduled to begin in July 2004 and will focus on the provision of services in accordance with the IFSP and in the natural environment. The Division is also going to be working with Alan Coulter from the National Center on Special Education Accountability Monitoring to develop a focused monitoring system during the summer of 2004.

Individual SPOE Noncompliance Issues Identified for FY 2002-03

	SPOE 1	SPOE 2	SPOE 4	SPOE 5	SPOE 6
	St. Charles	St. Louis	Atchison Area	Andrew Area	Platte-Clay-Ray
Provision of Prior Written Notice.			X	X	X
Content of Notice.				X	
Provision of Services.					X
Documentation of members of Multidisciplinary Evaluation Team.	X	X			
Application of eligibility criteria, particularly the use of Informed Clinical Opinion for children identified as eligible for services under the category of Developmental Delay.	X	X	X	X	X
Lack of documentation of the basis for the determination of eligibility.	X	X	X	X	X
The 45-day timeline for development of an IFSP from the date of referral was not being met.	X	X	X	X	X
Requirements for conducting a Family Assessment were not clearly understood.	X	X	X	X	X

Correction of Previous Noncompliance

DMH and DHSS were previously responsible for provision of services. Under the redesigned system, this is no longer the case. The following table shows that some areas of previous noncompliance have been resolved with the redesign, however others are still a concern. These areas are being monitored. The new RFP, to be implemented in July 2004, also addresses many of these areas by making SPOEs responsible for all aspects of the First Steps system within their regions.

Monitoring/Self-Study DMH/DHSS 1996-1999	Change	Phase 1 Initial Monitoring November, 2002
1. Lack of adequate notices and consents for evaluations and early intervention services	Development of standard forms; training of service coordinators Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Compliance Problem SPOEs 4, 5, 6
2. Failure to meet the 45 day timeline for evaluation and IFSP development	Development of vendor-based private service coordination to enhance capacity Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Compliance Problem SPOEs 1, 2, 4, 5, 6
3. Lack of written notification of IFSP meetings	Development of standard letter; training of service coordinators Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Not a problem
4. Lack of an IFSP document with all required components	Development of standard forms; training of service coordinators Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Not a problem
5. Lack of documentation of all early intervention services	Development of standard forms; training of service coordinators Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Compliance Problem SPOE 6
6. Lack of documentation for required developmental assessments	Development of standard forms; training of service coordinators Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Not a problem
7. Failure to notify the public of confidentiality procedures	DESE to develop public announcement and publish statewide DESE will conduct	Not a problem

Monitoring/Self-Study DMH/DHSS 1996-1999	Change	Phase 1 Initial Monitoring November, 2002
8. Failure to appropriately apply eligibility criteria	Development of process document/form and development of training module to address this issue. Phase 1 SPOE staff was trained on the model forms in January and February of 2002.	Compliance Problem SPOEs 1, 2, 4, 5, 6

Follow-up monitoring for the St. Louis SPOE conducted in November 2003 indicates that St. Louis still has issues in several areas. The remainder of Phase 1 follow-ups will be conducted in April and May of 2004. Many of these issues are addressed through the new RFP. Preliminary results for Phase 1 follow-ups and Phase 2 initial monitoring suggest that there are still areas of noncompliance, especially surrounding the application of eligibility criteria and meeting timelines. No monitoring of ongoing service coordinators or providers has occurred to this point. Many issues are addressed with the new webSPOE software and Phase 1 RFP, to be implemented in July 2004.

2. Targets: (for reporting period July 1, 2002 through June 30, 2003)

- Any areas of noncompliance identified and corrected in a timely manner.
- All Phase 1 SPOEs monitored in 2002-03.
- Monitoring staff to provide technical assistance for areas of noncompliance.

3. Explanation of Progress or Slippage: (for reporting period July 1, 2002 through June 30, 2003)

The new RFP for Phase 1 SPOEs addresses the lack of oversight and monitoring of service coordinators and providers. The new webSPOE software is very compliance driven and will ensure compliance proactively rather than after the fact.

Due to the full implementation towards the end of the reporting year (July 1, 2002 through June 30, 2003), data provided under "Baseline/Trend Data and Analysis" will be considered baseline. The only monitoring conducted in 2002-03 was for Phase 1 SPOEs that began operation April 1, 2002. The focus for the majority of 2002-03 was to reach full implementation for the redesigned First Steps program.

Significant progress in all areas was seen as Missouri completed implementation of a redesigned Part C system in March 2003. The redesign resulted in:

- Establishment of a Central Finance Office (CFO) and centralized child-level data system
- Establishment of 26 System Points of Entry covering the state
- Establishment of a system to credential providers
- Establishment of key components of a personnel development system including the following training modules: Orientation, Evaluation and Assessment, IFSP Outcomes in the Natural Environment, Transition, and Service Coordination

The redesigned First Steps system and practices are intended to ensure the following:

- Improved coordination between families and providers
- Decision-making between the Department of Elementary and Secondary Education (DESE), the CFO and SPOEs
- Data collection and analysis based on the SPOE data system
- Improved monitoring due to the amount of data available about children served

4. Projected Targets:

- All Phase 2 SPOEs will be monitored during 2003-04.
- All Phase 1 follow-ups conducted in 2003-04.
- Any areas of noncompliance are identified and corrected in a timely manner.
- Additional projected targets are in the Future Activities tables.

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

New Cluster/ Probe	IP Key	Activity Key	Activity Groups (5)	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.I	4.3	4.3.1	Development of monitoring standards	Timely provision of appropriate EI services	Services received in timely manner	4/2004	Comp
GS.I CC.I CC.II	4.3	4.3.2	Development of monitoring standards	Review application of eligibility criteria	Inappropriate eligibility determinations decreased	7/2003	Comp
GS.I CF CBT	4.3	4.3.3	Development of monitoring standards	Monitor for use and completion of mandated IFSP form	Revisions to mandated IFSP form completed	7/2004	Comp
GS.I CE.I CBT	4.3	4.3.4	Development of monitoring standards	Monitor for timely conduct of transition meetings	Timely transitions from Part C	9/2003	Comp
GS.I GS.II GS.V	4.4	4.4.1	Development of monitoring system	Monitoring of SPOEs	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	Ongoing	Comp
GS.I GS.II CE.I CE.II CE.III CBT	4.4	4.4.2	Development of monitoring system	DESE will examine policies and procedures re: eval/assess, eligibility determination, IFSP development, and C to B Transition with timelines, to ensure that these are clearly understood and consistently applied by SPOE staff, ongoing service coordinators and service providers.	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	10-11/2003	Comp

New Cluster/ Probe	IP Key	Activity Key	Activity Groups (5)	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.I GS.II	4.4	4.4.3	Development of monitoring system	Monitoring of service coordinators	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	7/2004 Ongoing	Comp
GS.I GS.I	4.4	4.4.4	Development of monitoring system	Monitoring of providers	Ongoing monitoring, correction of past deficiencies, enforcement actions implemented if needed	7/2004 Ongoing	Comp
GS.I	4.4	4.4.5	Development of monitoring system	Develop schedule for onsite monitoring of SPOEs	Schedule developed	Ongoing	Comp
GS.I GS.II	4.4	4.4.6	Development of monitoring system	Identify standards to be monitored	Standards identified	2003-04	Comp
GS.I GS.II	4.4	4.4.9	Development of monitoring system	Develop written monitoring procedures	Procedures developed	2003-04	Comp
GS.I CE.II	4.4	4.4.9.1	Development of monitoring system	Review eligibility determination document form (eval/assess covers five developmental areas)	Evaluation/Assessment includes information on all five developmental areas	4/2004	CMS, Comp
GS.I CE.II	4.4	4.4.9.2	Development of monitoring system	Review of IFSP for family assessment consent	Family assessment conducted with consent	4/2004	CMS, Comp
GS.I CE.III	4.4	4.4.9.6	Development of monitoring system	All services identified on IFSP are received	IFSP services and authorizations correspond	Ongoing	Comp
GS.I CBT	4.5		Follow up of Phase 1 SPOEs		Correction of non-compliance, enforcement actions implemented if needed	10-11/2003 4-5/2004	Comp
GS.I CBT	4.6		Initial Monitoring of Phase 2 SPOEs		Initial monitoring completed, enforcement actions implemented if needed	10-11/2003, 4-5/2004	Comp
GS.I GS.II GS.IV	7.1	7.1.1	Facilitators	Determine if we want to continue	All areas in compliance	7/04, Ongoing	Funds, Monitoring system

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GS.I GS.II GS.IV	7.1	7.1.2	Facilitators	Review work scope of facilitators	All areas in compliance	7/04, Ongoing	Funds, Monitoring system
GS.I GS.II GS.IV	7.1	7.1.3	Facilitators	Can a SPOE be a facilitator?	All areas in compliance	7/04, Ongoing	Funds, Monitoring system
GS.I GS.II GS.IV	7.2		SPOE Oversight	Review existing system and develop for oversight of service coordinators and providers	All areas in compliance	7/04, Ongoing	Funds, Monitoring system
GS.I GS.II GS.IV	7.3		First Steps Consultants	Revise/expand contracts to provide technical assistance and monitoring of SPOEs	All areas in compliance	7/04, Ongoing	Funds, Monitoring system